CODE OF CONDUCT

Raahen Terästuote Oy

This Code of Conduct describes how Raahen Terästuote Oy acts towards its personnel, customers, suppliers and other interested parties. It applies to all personnel and management of the company, and to agency workers and subcontractors working on the company's behalf. Environmental matters are covered by a separate environmental policy.

1. Our values

- **Working together.** We complete projects to a high standard in close cooperation with customers, personnel, suppliers and other interested parties.
- **Respecting the individual.** We are reliable, treat everyone fairly and without discrimination, and behave appropriately in all situations.
- **Service attitude.** We deliver our services cost-effectively and in line with customer requirements, and we develop continuously.
- **RTT spirit.** We encourage creativity and commitment and maintain a good working atmosphere.

2. Human rights and working conditions

- We do not accept child labour or forced labour in any form. We verify the age of employees before employment begins, and we comply with the Finnish Young Workers' Act in the work of young employees.
- We do not retain employees' identity documents.
- Wages and working hours are determined in accordance with the collective agreement and the Working Hours Act. Overtime is compensated.
- Employees have the right to join a trade union.
- We treat everyone fairly. Discrimination and harassment are not accepted.
- **Reporting channel.** Concerns, discrimination, harassment and suspected misconduct can be reported through the observation reporting system or anonymously on a separate slip. Reports are handled by the managing director. No one who makes a report will be penalised or subjected to any other retaliation.

3. Occupational health and safety

- We maintain an occupational safety action programme, which is reviewed and updated annually. Work hazards are assessed, and actions are determined on the basis of the assessment.
- Everyone receives induction in their work and its safety aspects before starting work.
- Personal protective equipment is used as instructed, and hearing protection is mandatory in the production facilities. Employees are covered by occupational health care.
- A safety plan is prepared for installation work before the work begins. A valid hot work licence is required at temporary hot work sites.
- Near misses and accidents are reported in the observation reporting system, and their causes are investigated.

4. Business ethics

- We neither give nor accept bribes. Gifts or hospitality are neither given nor accepted if they could influence decisions. Reasonable business gifts and customary hospitality are permitted.

Gifts and invitations worth more than EUR 100, such as trips and events, must be agreed in advance with the managing director.

- If a personal interest could affect the performance of work duties, it must be disclosed to the line manager.
- We comply with competition law.
- We handle customers' drawings and other confidential material in accordance with non-disclosure agreements and use them only for the delivery concerned. Personal data is processed in accordance with data protection legislation.

5. Suppliers and subcontractors

- We require our suppliers and subcontractors to comply with the law and with the human rights, occupational safety and ethics requirements of this Code of Conduct and with our environmental policy.
- Subcontractors must meet the obligations of the Finnish Contractor's Liability Act. Subcontractors are audited, and a list of approved subcontractors is maintained in the enterprise resource planning system.
- A supplier's approval may be withdrawn if it neglects its statutory obligations or these principles.

6. Responsibility and monitoring

Everyone is responsible for complying with these principles in their own work. The managing director is responsible for maintaining these principles and monitoring their implementation. The principles are covered in the induction of new employees and reviewed annually in the management review.

Raahe, 1 November 2026



Marko Rinkinen
Managing Director